

CRIMINAL COMPLAINT

I, TFO Robert Owen, being duly sworn, state the following is true and correct to the best of my knowledge and belief, but are not inclusive of all the evidence or information in the case:

Conspiracy to Possess with Intent to Distribute a Controlled Substance (Violation of 21 U.S.C. § 846)

Beginning in or before November 2021, and continuing until in and around May 2022, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Jesus Ibarra-Alvarez**, **Dario Ochoa**, **Jr.**, and **Alexis Rosales**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), namely to possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)).

I am an "investigative or law enforcement officer of the United States" within the meaning of 18 U.S.C. § 3061. I am currently assigned as a Special Agent with the Drug Enforcement Administration in Fort Worth, Texas. This complaint is based on the following facts.

PageID 3

- 1. During the month of February 2022, a DEA CS (hereinafter referred to as CS) purchased one kilogram of methamphetamine from Alexis ROSALES and Jesus IBARRA-Alvarez in the Walmart parking lot located in Arlington, Texas. Following the purchase, the CS communicated with ROSALES and requested a meeting with IBARRA-Alvarez to talk about a future multi-kilogram transaction. ROSALES subsequently provided the CS with IBARRA-Alvarez's telephone number.
- 2. On May 3, 2022, the CS conducted a meeting with Jesus IBARRA-Alvarez in the Walmart parking lot located in Arlington, Texas. The CS and IBARRA-Alvarez agreed to a price of \$3,700.00 per kilogram of methamphetamine. The CS and IBARRA-Alvarez further agreed to conduct a twenty-kilogram crystal methamphetamine drug transaction to take place within the week.
- On May 9, 2022, the CS communicated with ROSALES by telephone regarding 3. the pending methamphetamine transaction and his (the CS's) prior conversation with IBARRA-Alvarez about the drug deal. The CS informed ROSALES that IBARRA-Alvarez would take possession of all the drug proceeds and IBARRA-Alvarez would provide payment to ROSALES at a later date. ROSALES agreed and told the CS that he trusted IBARRA-Alvarez to take his (ROSALES's) payment.
- 4. On May 10, 2022, the CS continued telephonic communications with IBARRA-Alvarez regarding the pending drug transaction and agreed to meet at a public parking lot in Dallas, Texas. Agents established surveillance at IBARRA-Alvarez's residence located at 622 Pleasant Valley Road, Garland, Texas. There, agents/officers observed IBARRA-Alvarez and an unknown Hispanic male, who was later identified as Dario OCHOA, Jr.

Agents saw OCHOA, Jr. carrying a large cardboard box from the front of the house to the driveway. Agents observed OCHOA, Jr. open the trunk of IBARRA-Alvarez's blue Toyota Corolla, bearing TX LP #RDK3816, which was parked in the driveway of the residence. OCHOA, Jr. subsequently placed the cardboard box into the trunk and entered the vehicle by the front passenger door. Agents followed IBARRA-Alvarez and OCHOA. Jr. as they traveled from the residence directly to the agreed upon meeting location in Dallas, Texas. Upon arrival, IBARRA-Alvarez informed the CS by telephone he was in the parking lot and the CS directed IBARRA-Alvarez to the CS's exact location in a different parking lot. Agents observed IBARRA-Alvarez park next to the CS's vehicle. The CS, IBARRA-Alvarez, and OCHOA, Jr. exited their vehicles and engaged in conversation. While they were all engaged in conversation, IBARA-Alvarez opened the trunk of the vehicle to show the CS the crystal methamphetamine. The CS observed numerous gallon sized zip-loc bags containing a white crystal-like substance. At that point, the CS provided the arrest signal and IBARRA-Alvarez and OCHOA, Jr. were subsequently arrested without incident.

5. Agents searched IBARRA-Alvarez's vehicle and located a cardboard box in the trunk of the vehicle containing approximately twenty zip-lock bags containing a crystallike substance. A field test of the suspected crystal methamphetamine was conducted, which tested presumptive positive for the presences of methamphetamine weighing in at approximately twenty kilograms of crystal methamphetamine. Agents also located a Glock 19x secured in a holster on OCHOA, Jr.'s person. A subsequent check revealed the firearm was reported stolen out of Mesquite, Texas.

- 6. Agents queried law enforcement databases and learned that OCHOA, Jr. crossed the border into Mexico on approximately twenty-two occasions from 2006 to 2022 with approximately fifteen crossings into Mexico within the past ten years. IBARRA-Alvarez crossed the border into Mexico on approximately three occasions since September 2021.
- 7. Although I have not listed all the facts regarding this conspiracy, I believe the facts stated above establish probable cause that the above-named defendants have violated 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)).

Task Force Officer Robert Owen Drug Enforcement Administration

SWORN AND SUBSCRIBED before me on this _____ day of May 2022 at ______ day of May 2022

URETON

UNITED STATES MAGISTRATE JUDGE